

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT DOUGLAS HARTMAN,

Defendant.

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No.: 4:07CR00405-HEA (DDN)

MOTION TO CONTINUE TRIAL

COMES NOW Defendant, Robert Douglas Hartman, by and through counsel, and for his Motion to Continue Trial states as follows:

1. Trial in this matter is currently scheduled to begin on April 20, 2009 at 9:30 a.m..
2. Undersigned counsel is scheduled to begin trial on March 23, 2009 in the United States District Court for the Southern District of Illinois in the case of *United States of America v. Kevyn Taylor*, Case No.: 08cr30061.
3. In addition, undersigned counsel is scheduled to begin trial on April 6, 2009 in the United States District Court for the Eastern District of Missouri in the Southeast Division in the case of *United States v. Michael Meador*, Case No.: 06cr134.
4. It is anticipated that each of those trial will last approximately one week.
5. Preparation for these two trials in which defendants are adamant about having trials prevents counsel from spending the necessary preparation time in this case thereby infringing this defendant's Sixth Amendment rights.

WHEREFORE, Defendant prays this Court continue the Trial in this matter to a date to be set by the Court at a later time.

Respectfully submitted,

/s/Burton H. Shostak
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2009, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. James E. Crowe, Jr.
Assistant United States Attorney
111 South Tenth Street, Room 20.33
St. Louis, Missouri 63102

/s/Burton H. Shostak